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Attorneys for Defendant  
CITY AND COUNTY OF SAN FRANCISCO

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

JANE ROE, an individual; MARY ROE, an individual; SUSAN ROE, an individual; JOHN ROE, an individual; BARBARA ROE, an individual; PHOENIX HOTEL SF, LLC, a California limited liability company; FUNKY FUN, LLC, a California limited liability company; and 2930 EL CAMINO, LLC, a California limited liability company,

Case No. 4:24-cv-01562-JST

**STIPULATION AND [PROPOSED] ORDER  
REGARDING WRITTEN DISCOVERY  
FOLLOWING THE CLOSE OF FACT  
DISCOVERY**

Trial Date: August 10, 2026

CITY AND COUNTY OF SAN  
FRANCISCO, a California public entity.

Defendant.

## STIPULATION

WHEREAS, Defendant served Requests for Production of Documents on all Plaintiffs, including requests for photos and videos depicting conditions in the Tenderloin.

WHEREAS, Plaintiffs have produced photos and videos depicting conditions in the Tenderloin.

WHEREAS, during the meet and confer process, Defendant requested information sufficient to determine the date each photo and video was taken.

WHEREAS, Plaintiffs have provided information for some of the photos and videos they produced to Defendant.

WHEREAS, for those photos and videos for which Plaintiffs have not provided any date information, Plaintiffs are working to provide information concerning the date that each photo and video was taken or, for photos or videos taken before the filing of this case (March 14, 2024), confirmation that the photo or video was created before the case was filed. Plaintiffs expect to complete production of this information no later than January 30, 2026.

WHEREAS, the fact discovery cutoff is Monday, January 5, 2026 (ECF No. 99).

THEREFORE, IT IS HEREBY AGREED AND STIPULATED that:

1. Plaintiffs may produce the requested information regarding the dates of photos and videos previously produced in discovery after the close of fact discovery on Monday, January 5, 2026. Plaintiffs must produce the requested information regarding the dates of photos and videos previously produced in discovery no later than January 30, 2026.

2. If, by January 30, 2026, Plaintiffs have not provided information about the date a photo or video was taken, then Plaintiffs are precluded from offering information about the date that photo or video was taken in their case-in-chief. Plaintiffs are not precluded from introducing the photo or video for which date information was not provided by January 30, 2026, but are precluded from offering information about the date that photo or video was taken. Nor are Plaintiffs precluded from introducing information about the date a photo or video was taken if they have provided information about the date it was taken to Defendant on or before January 30, 2026.

1  
2 Dated: December 31, 2025

3 DAVID CHIU  
4 City Attorney  
5 YVONNE R. MERÉ  
6 Chief Deputy City Attorney  
7 TARA M. STEELEY  
8 JOHN H. GEORGE  
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12 Deputy City Attorneys

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14 By: s/John H. George  
15 JOHN H. GEORGE

16 Attorneys for Defendant  
17 CITY AND COUNTY OF SAN FRANCISCO

18  
19 Dated: December 31, 2025

20 WALKUP, MELODIA, KELLY & SCHOENBERGER

21 By: \*\*s/Ashcon Minoiefar  
22 ASHCON MINOIEFAR

23 Attorneys for Plaintiffs  
24 JANE ROE, MARY ROE, SUSAN ROE, JOHN ROE,  
25 BARBARA ROE, PHOENIX HOTEL SF, LLC, FUNKY  
26 FUN, LLC, and 2930 EL CAMINO, LLC

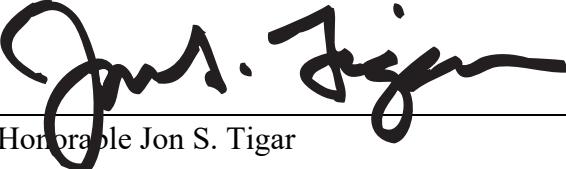
27  
28 *\*\*Pursuant to L.R. 5-1(h)(3), the electronic signatory attests that each of the other Signatories have concurred in the filing of this document.*

**{PROPOSED} ORDER**

1  
2 Pursuant to the parties' stipulation, Federal Rule of Civil Procedure 29, and for good cause  
3 shown, Plaintiffs may produce the requested information regarding the dates of photos and videos  
4 previously produced in discovery after the close of fact discovery on Monday, January 5, 2026.  
5 Plaintiffs must produce the requested information regarding the dates of photos and videos previously  
6 produced in discovery no later than January 30, 2026.

7 If, by January 30, 2026, Plaintiffs have not provided information about the date a photo or  
8 video was taken, then Plaintiffs are precluded from offering information about the date that photo or  
9 video was taken in their case-in-chief. Plaintiffs are not precluded from introducing the photo or video  
10 for which date information was not provided by January 30, 2026, but are precluded from offering  
11 information about the date that photo or video was taken. Nor are Plaintiffs precluded from  
12 introducing information about the date a photo or video was taken if they have provided information  
13 about the date it was taken to Defendant on or before January 30, 2026.

14 Date: January 6, 2026



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15 The Honorable Jon S. Tigar

16 UNITED STATES DISTRICT COURT